

CLARKE & RICE, APC
1010 Second Avenue, Ste. 1800
San Diego, California 92101
(619) 308-8484

FEDERAL PUBLIC DEFENDER OFFICE
DISTRICT OF MASSACHUSETTS
51 Sleeper Street, Fifth Floor
Boston, Massachusetts 02210
(617) 223-8061

DAVID I. BRUCK
220 Sydney Lewis Hall
Lexington, VA 24450
(540) 458-8188

December 24, 2014

Aloke Chakravarty
Nadine Pellegrini
William Weinreb
Assistant U.S. Attorneys
United States Courthouse
1 Courthouse Way, Suite 9200
Boston, Massachusetts 02210

Re: United States v. Dzhokhar Tsarnaev
Criminal No. 13-10200- GAO

Dear Counsel:

Thank you for your prompt response to our letter of yesterday evening.

You state that “the letter was intended to be sent only to the government’s non-law enforcement expert witnesses (and, evidently was sent to one defense expert witness as well).” This leaves unanswered whether any *similar* communications have been sent to non-expert civilian witnesses. In order to be in a position to respond fully to your motion regarding law enforcement home addresses by today’s 3:00 p.m. filing deadline, we must know whether, how, and in what terms *all* of the government witnesses have been notified of the government’s statutory obligations to provide their “places of abode” to defense counsel. To the extent that such notification is still pending, we must also know how and in precisely what terms the government intends to effect such notification. This includes how the government plans to notify witnesses whose home addresses are already in the government’s possession that their addresses have been or will be provided to the defense.

Nadine Pellegrini, Aloke Chakravarty & William Weinreb
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Given the very compressed filing schedule that has been ordered at the government's request, we would appreciate your furnishing this information to us as soon as possible, and in any event no later than noon today.

Sincerely,

/s/ David I. Bruck

David I. Bruck
Judy Clarke
Miriam Conrad
William Fick
Timothy Watkins